

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO
AT COLUMBUS DIVISION**

In Re:
Christine H. Lewis
Jack D. Lewis, Jr.

Debtor(s)

Case No.: 16-57542

Chapter 13

Judge: C. Kathryn Preston

OBJECTION TO CHAPTER 13 PLAN

Creditor, MB Financial Bank, National Association (“Movant”), by and through counsel, hereby objects to the proposed Chapter 13 Plan filed by the Debtors. This Objection is hereby supported by the following Memorandum.

Respectfully Submitted,

/S/ Patricia L. Johnson

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MEMORANDUM

Movant holds a secured Mortgage for property located at 2148 Dunkeld Dr, Grove City, OH 43123. Movant will be filing a Proof of Claim listing an approximate arrearage in the amount of \$5,188.41. The Chapter 13 Plan as filed lists an approximate arrearage in the amount of \$4,115.70. The Chapter 13 Plan proposes to treat Movant's claim unfairly by providing for an inadequate arrearage amount. Movant objects to said treatment and asserts that, as of the Petition date herein, Movant's claim was fully secured by value in the real estate. Accordingly, §1322(b)(2) of the Bankruptcy Code prohibits Debtor's proposed modification of Movant's mortgage.

WHEREFORE, Movant respectfully requests the Court to deny confirmation of the Debtor's Proposed Plan.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing was electronically transmitted on the 22nd day of December, 2016 via the Court's CM/ECF system to the following who are listed on the Court's Electronic Mail Notice list:

Frank M. Pees, Chapter 13 Trustee at trustee@ch13.org
130 East Wilson Bridge Road Suite 200
Worthington, OH 43085
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Asst US Trustee (Col), U.S. Trustee at ustpreregion09.cb.ecf@usdoj.gov
Office of the US Trustee 170 North High Street Suite 200
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The undersigned certifies that a copy of the foregoing was transmitted on the 22nd day of December, 2016 via regular U.S. mail, postage pre-paid:

Christine H. Lewis
2148 Dunkeld Drive
Grove City, OH 43123

Jack D. Lewis, Jr. fdba Metro Collision of Columbus fdba Collision Express of Ohio Inc.
fdba Carstar Bexley
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